



State of North Carolina
Department of Environment, Health, and Natural Resources
512 North Salisbury Street • Raleigh, North Carolina 27604

James B. Hunt, Jr., Governor

Division of Solid Waste Management
Telephone (919) 733-4996

Jonathan B. Howes, Secretary

March 15, 1993

Commander, Atlantic Division
Naval Facilities Engineering Command
Code 1822

Attention: MCB Camp Lejeune, RPM
Mr. Byron Brant, P.E.
Norfolk, Virginia 23511-6287

Commanding General
Attention: AC/S, Environmental Management
Building 1, Marine Corps Base
Camp Lejeune, North Carolina 28542-5001

RE: Draft Site Investigation, Site 63 - Verona Loop Dump
Jacksonville, Onslow County, North Carolina

Dear Mr. Brant:

The State of North Carolina has reviewed the referenced document along with comments prepared by the US EPA Region 4. The state has also enclosed our comments to the draft document.

The state concurs with the recommendation that additional work be conducted at the site. We look forward to the inclusion of our comments along with EPA's comments in planning the work. At the completion of the additional work, the document should be resubmitted with final recommendations for the disposition of the site. If you have any questions please contact me at (919) 733-2801.

Sincerely,

A handwritten signature in cursive script that reads "E. Peter Burger".

E. Peter Burger, P.E.
Environmental Engineer
NC Superfund Section

Enclosure

cc: Michelle Glenn, US EPA
Neil Paul, MCB Camp Lejeune

Site 63
Verona Loop Dump
MCB Camp Lejeune, Jacksonville, Onslow County, NC
March 11, 1993

GENERAL COMMENTS

1. Inorganic compounds are present in soils, sediments, surface water and groundwater. Lead is higher than what would be expected from the corresponding lead levels in the soil. Beryllium and low levels of organics are found in the groundwater and not in the soils. This may indicate migration of contaminants from off site.

It is recommended that additional site investigation be performed to further characterize the site and determine if any sources or hot spots are present. Additional background data on groundwater and soils would also be helpful to identify any contaminants migrating from off site, and verify background levels.

Other contaminants at the site, such as pesticides and one hit of PCB, appear to be limited to the surficial soils of the site. Any additional sampling should continue to analyze for these contaminants.

2. Please note that semi volatiles have been found in soils only in borings developed into monitoring wells. This is also true of soil borings/monitoring wells constructed at Site 43. The monitoring wells at both sites were installed during the same event, August 8 and 9, 1991. This coincidence should be evaluated to determine if there were any inadequacies in field techniques, or QA/QC procedures that may have resulted in the introduction of contaminants.
3. The State concurs with remarks made by the EPA concerning the Preliminary Risk Assessment.

SPECIFIC COMMENTS

Page ES-3, 2nd paragraph. Add NC Groundwater Standards to Federal Drinking Water Standards.

Page ES-3, Conclusions/Recommendations. No conclusions can be drawn until additional site characterization data and site specific background data can be collected and analyzed.

Page 1-7, Figure 1-3. If possible, please provide some contours on site maps to give the reader a better sense of general topography.

Page 1-9, 3rd paragraph. It is noted that groundwater samples were not filtered. What is the EPA's present position on filtering groundwater samples? Are samples filtered before analysis? If metals or other contaminants have sorbed to fines, will this result in an inaccurate characterization of the groundwater?

Page 3-1, Section 3.2. The types of wastes at this site are not known. To state that the wastes "only consist of bivouac wastes" implies, without proper justification, a great deal of certainty about the past activities at this site.

Table 5-4. Correct NC Groundwater Standard from Iron to 0.3 mg/l.